

1 BARRY J. PORTMAN  
Federal Public Defender  
2 SHAWN HALBERT  
Assistant Federal Public Defender  
3 450 Golden Gate Avenue  
San Francisco, CA 94102  
4 Telephone: (415) 436-7700

5 Counsel for Defendant FERNANDO JARQUIN-VASQUEZ

6  
7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 CR 10-0260 WHA  
11 UNITED STATES OF AMERICA, )  
12 Plaintiff, )  
13 v. )  
14 FERNANDO JARQUIN-VASQUEZ, )  
15 Defendant. )  
16 )  
17 )

18 The parties are scheduled to appear before this Court for status on May 18, 2010 at 2:00 p.m.  
19 The defense requests additional time to obtain and review additional materials relevant to the case  
20 and to meet with her client to discuss how to proceed. Undersigned defense counsel will be out of  
21 the office almost every day between May 21, 2010 and June 4, 2010 on personal and professional  
22 business, and thus requests that the matter be continued to June 15, 2010. The government does not  
23 object to this request.

24 The parties also agree that the time between May 18, 2010 and June 15, 2010 should be  
25 excluded under the Speedy Trial Act; the continuance is necessary for effective preparation of  
26 counsel and continuity of counsel, 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv), and the ends of

1 justice served by granting such a continuance outweigh the best interests of the public and the  
2 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

3 SO STIPULATED:

4 JOSEPH P. RUSSONIELLO  
5 United States Attorney

6 DATED: May 17, 2010

/s/

7 BRIAN LEWIS  
8 Assistant United States Attorney

9 DATED: May 17, 2010

/s/

10 SHAWN HALBERT  
11 Assistant Federal Public Defender

12  
13 **~~PROPOSED~~ ORDER**

14 For the reasons stated above, the Court finds that the continuance of time for the next hearing  
15 before this Court from May 18, 2010 to June 15, 2010 is warranted. Further, the Court finds that an  
16 exclusion of time under the Speedy Trial Act between May 18, 2010 and June 15, 2010 is  
17 appropriate because the failure to grant the requested continuance would deny the defense effective  
18 preparation of counsel and continuity of counsel; thus, the ends of justice served by the continuance  
19 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161  
20 (h)(7)(A), (h)(7)(B)(iv).

21  
22 SO ORDERED.

23  
24 DATED: May 17, 2010

25 THE HONORABLE  
26 United States District Judge

